

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs

Cause No. 05-CR-1849-JH

GREG HILL,

Defendant.

**UNOPPOSED MOTION TO CONTINUE SENTENCING**

Defendant Greg Hill, by and through his attorney Billy R. Blackburn, and with the concurrence of Assistant United States Attorney James Braun and respectfully requests this Court to vacate and continue the sentencing hearing currently scheduled for November 9, 2010. As grounds in support thereof, Defendant states as follows:

1. On or about August 23, 2005, the Defendant Greg Hill was indicted and charged with conspiracy to distribute 1000 kilograms and more of marijuana, conspiracy to launder money and criminal forfeiture.
2. On or about August 25, 2005, the Defendant appeared for initial appearance before V. Sue Shields, U.S. Magistrate Judge for the Southern District of Indiana, who released Defendant pending trial. On September 1, 2005, the Defendant traveled to New Mexico and was arraigned before U.S. Magistrate Judge Richard Puglisi. Judge Puglisi adopted the conditions set by Judge V. Sue Shields. Defendant has remained out of custody without incident since his arrest in August 2005.
3. On August 13, 2010, Defendant entered a plea of guilty before U.S. Magistrate Judge Alan C. Torgerson in this matter. Judge Torgerson continued Hill's

conditions of release pending sentencing. All other co-defendants had previously entered guilty pleas in this matter.

4. On August 15, 2010, this Court entered an order scheduling sentencing in this matter for November 9, 2010.

5. Defendant traveled from his home in Bloomington, Indiana to Albuquerque, New Mexico for a presentence report interview with Probation Officer Tina Parde on September 9, 2010. Due to the nature of this matter and the presentence report, as of the filing of this Motion, a draft presentence report has not yet been completed. Pursuant to Ms. Parde's request, Defendant is diligently working to gather all necessary financial documentation for said report. However, given that Defendant is an independent business owner, said process is lengthy and cumbersome.

6. Defendant requires additional time to gather and provide documentation to the probation office for inclusion in the presentence report. Furthermore, given the complicated nature of this case, Defendant requires additional time within which to fully and adequately prepare for sentencing, including time within which to review a presentence report once it is completed and provide the Court with all information relevant to the sentencing factors set forth in 18 U.S.C. §3553.

7. Assistant U.S. Attorney James Braun has been contacted concerning this motion and has no objection to the relief requested herein.

8. Attorney Billy R. Blackburn has discussed this matter with United States Probation Officer Tina Parde, who is currently preparing the Defendant's presentence report. Ms. Parde has indicated she has no objection to the relief requested herein.

WHEREFORE, for the above stated reasons, the Defendant Greg Hill respectfully requests this Court to vacate and continue the sentencing hearing currently scheduled for November 9, 2010.

Respectfully submitted,

*Electronically filed 10/14/10*

BILLY R. BLACKBURN  
Attorney for Defendant  
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I hereby certify that a true and accurate copy of the foregoing was emailed by CM/ECF to AUSA James Braun this 14th day of October, 2010.

*Electronically filed 10/14/10*

Billy R. Blackburn